

in amount equal to their liability for back wages as a result of this FLSA violation; 4) Defendants' violations were willful in nature; 5) Edward Satell is an "employer" under Section 3(d) of the FLSA, 29 U.S.C. § 203(d); and 6) Defendants violated the recordkeeping provisions of Section 11(c) of the FLSA, 29 U.S.C. § 211(c), as a result of their failure to maintain records of all hours worked by their employees.

The reasons for this Motion are set forth in the accompanying Memorandum of Law.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Partial Summary Judgment, Proposed Order and Memorandum of Law was served on the following via electronic filing this 23rd day of May, 2014, and are available for viewing and downloading on the ECF system:

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I hereby certify that a true and correct copy of the foregoing Plaintiff's Supplemental Appendix in Support of Motion for Partial Summary Judgment was served on the following via hand delivery this 23rd day of May, 2014.

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